

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 12- 180 (JRT)

UNITED STATES OF AMERICA,)	
)	INFORMATION
Plaintiff,)	
)	(18 U.S.C. § 1344)
v.)	
)	
KEVIN A. DAHL,)	
)	
Defendant.)	

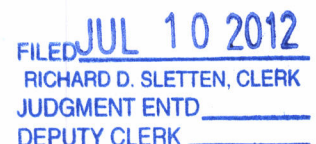
THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times relevant, the deposits at Lake Area Bank, First National Bank of Northfield, Voyager Bank, and Community Banks of Colorado were insured by the Federal Deposit Insurance Corporation.

2. From or about February 6, 2007 until approximately February 1, 2008, in the State and District of Minnesota and elsewhere, KEVIN A. DAHL ("DAHL") knowingly and intentionally devised and engaged in a scheme and artifice to defraud and to obtain money, funds, credits, and assets from the above named federally-insured banks by means of false and fraudulent pretenses, representations, and promises.

3. The scheme involved submitting false information and supporting documents in connection with loans sought and obtained from the above named banks.

4. In particular, the defendant falsely represented in loan applications provided to the banks that he had assets worth



more than \$9 million, and he submitted false and fraudulent purported correspondence to substantiate this misrepresentation. These representations were material.

5. The above named banks lent the defendant funds based on his material misrepresentations. Altogether the above banks suffered an aggregate loss of at least \$1,445,166.82.

Count 1
(Bank Fraud)

6. Paragraphs 1-5 are realleged and reincorporated as if set forth in full herein.

7. On or about April 23, 2007, in the State and District of Minnesota, the defendant,

KEVIN A. DAHL,

for the purpose of executing the above-referenced scheme to defraud, and to obtain monies, funds, credits, and assets owned by and under the custody and control of federally-insured banks, knowingly submitted a loan application supported by a false and fraudulent statement of assets, all in violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATIONS

Count 1 of this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2)(A).

As the result of the offense alleged in Count 1 of this Information, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(A), any property, real or personal, which constitutes or is derived from proceeds the person obtained directly or indirectly, as the result of the violations of Title 18, United States Code, Section 1344.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All in violation of Title 18, United States Code, Sections 982(a)(2)(A) and 1344.

Respectfully submitted,

B. TODD JONES



BY: ROBERT M. LEWIS
Attorney ID No. 249488

Dated: July 10, 2012